

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

MILWAUKEE COUNTY, et al.,

Plaintiffs,

v.

Case No. 06-CV-0372

MERCER HUMAN RESOURCE  
CONSULTING, INC.

Defendant.

---

**DECLARATION OF ERIC J. VAN VUGT IN SUPPORT OF  
MERCER'S MEMORANDUM OF LAW IN SUPPORT OF THE NECESSITY AND  
APPROPRIATENESS OF ITS SUPPLEMENTATION OF EXPERT DISCLOSURES  
UNDER FED. R. CIV. P. RULE 26(e)**

---

I, Eric J. Van Vugt, under penalty of perjury under the laws of the United States, and pursuant to 28 U.S.C. § 1746, declare that the following facts are true and correct:

1. I am a partner in the Milwaukee office of Quarles & Brady LLP, attorneys for the Defendant, Mercer Human Resource Consulting, Inc., nka Mercer (US) Inc. ("Mercer"). I have been involved in Mercer's defense in this matter from the commencement of this action. I make this declaration upon my personal knowledge.

2. Attached hereto are true and correct copies of the following exhibits:

- **Exhibit A** – Expert Report of Donald F. Behan, February 13, 2008.
- **Exhibit B** – Expert Report of Dennis A. Skelly, February 13, 2008.

- **Exhibit C** – Supplemental Expert Report of Dennis A. Skelly, April 6, 2009.
- **Exhibit D** – Supplemental Expert Report of Donald F. Behan, April 6, 2009.
- **Exhibit E** – Letter from Paul D. Bauer to Kenneth E. McNeil, November 14, 2008.
- **Exhibit F** – Letter from Paul D. Bauer to Kenneth E. McNeil, April 25, 2007.
- **Exhibit G** – Letter from Paul D. Bauer to Kenneth E. McNeil, January 25, 2008.
- **Exhibit H** – Letter from Paul D. Bauer to Kenneth E. McNeil, February 1, 2008.
- **Exhibit I** – Letter from Paul D. Bauer to Kenneth E. McNeil, August 25, 2008.
- **Exhibit J** – Letter from Paul D. Bauer to Chris Trebatoski, January 21, 2009.

Dated this 14th day of April, 2009.

s/ Eric J. Van Vugt